



VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

March 7, 2014

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Suite TW-A325
Washington, DC 20554

Re: Cumby Telephone Cooperative, Inc. Expression of Interest for Rate-of-Return Area Rural
Broadband Experiment
WC Docket No. 10-90 – Connect America Fund

Dear Ms. Dortch:

Cumby Telephone Cooperative, Inc. (Cumby) hereby submits this non-binding expression of interest to conduct a rate-of-return area Rural Broadband Experiment. Cumby is both a rate-of-return regulated incumbent local exchange carrier (ILEC) and a competitive local exchange carrier (CLEC) in east Texas. This expression of interest is for Cumby's ILEC service area in Cumby, TX. A separate expression of interest is being filed for Cumby's CLEC operation in neighboring price cap area territory.

Background

Cumby was founded in 1967, and is wholly owned by its subscriber members. Cumby offers high-quality voice, Internet, and video services. Wireline-based broadband services are currently available in all of our exchanges, although small pockets of unserved and underserved customers remain due to their remoteness. In most cases, the download broadband speeds offered are 2 Mbps, 4 Mbps, 6 Mbps, and 10 Mbps. Cumby offers high-quality voice, broadband, and video services to all businesses and anchor institutions. In Cumby's CLEC exchanges, we hold market shares ranging from 60 to nearly 100 percent. We are also an eligible telecommunications carrier (ETC) in all of our CLEC exchanges.



"Yesterday's Telephone,¹ Tomorrow's Technology"

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PH: 903.994.2211 • Toll Free: 888.994.4604 • Fax: 903.994.2200

Proposal

Cumby exchange, Hopkins County, Census Tract 48223950200

Cumby's ILEC service territory consists of one exchange in Cumby, TX. While Cumby is presently able to offer most of its customers broadband speeds that exceed 3 Mbps downstream / 768 kbps upstream, there remain approximately 130 customers to which such speeds are presently unavailable due to their dispersed and remote locations. These customers are mostly residential but may also include a few small businesses. Cumby is committed to bringing high-quality broadband to these customers. To do so will require investment in additional fiber and remotes. However, Cumby will be unable to make this investment in the near-term absent additional universal service support. Therefore, Cumby expects to request one-time support of approximately \$274,000 for this investment in the formal proposal stage.

Upon receipt of the Connect America Fund (CAF) support, Cumby expects to be able to make improved broadband offerings available in approximately three months. Cumby plans to offer these customers download speeds of 4 Mbps, 6 Mbps, and 10 Mbps, at the same price points it offers these tiers to existing broadband customers. It also plans to offer video service. Cumby is currently offering wireline voice service to these customers and would continue to do so.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Zimmerman", with a large, loopy flourish extending from the end of the signature.

Karen Zimmerman
General Manager
Cumby Telephone Cooperative, Inc.